

EPSTEIN BECKER & GREEN, P.C.  
Attorneys for Defendant  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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PATIENT CARE ASSOCIATES, LLC, a/s/o	:	
C.B and V.G.,	:	
	:	Civil Action No. 13-cv-1472-ES-SCM
Plaintiffs,	:	
	:	
vs.	:	
	:	<b>NOTICE OF MOTION TO DISMISS</b>
UNITED WATER; ABC CORP. (1-10)	:	<b>PURSUANT TO FED. R. CIV. P. 12(b)(6)</b>
(said names being fictitious and	:	
unknown entities),	:	
	:	
Defendants.	:	<b>Document Electronically Filed</b>
	:	
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To: Andrew R. Bronsnick, Esq.  
Massood & Bronsnick, LLC  
50 Packanack Lake Road East,  
Wayne, New Jersey 07470.  
Attorneys for Plaintiff

**PLEASE TAKE NOTICE THAT**, on June 3, 2013, at 10:00 a.m., or as soon thereafter as counsel may be heard, Defendant, United Water New Jersey Inc., through its attorneys Epstein Becker & Green, P.C. (James P. Flynn, Esq. appearing), will move before the Honorable Esther Salas, U.S.D.J. for an Order dismissing all claims of Plaintiff Patient Care Associates, LLC, a/s/o C.B. and V.G.

**PLEASE TAKE FURTHER NOTICE THAT** Defendant will rely on the accompanying memorandum of law and Certification of James P. Flynn, with attached exhibits.

**PLEASE TAKE FURTHER NOTICE THAT** Defendant has also submitted a proposed form of order, and requests oral argument.

DATED: May 1, 2013

**s/ James P. Flynn**

James P. Flynn

Epstein Becker & Green, P.C.

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